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BAKER & MILLER PLLC

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RECEIVED
PUBLIC SERVICE
COMMISSION

WILLIAM A. MULLINS

(202) 663-7823 (Direct Dial)
E-Mail: wmullins@bakerandmiller.com

December 9, 2014

Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Columbia, SC 29210

RE: *Greenville County Economic Development Corporation – Abandonment
Exemption - In Greenville County, SC, STB Docket No. AB-490 (Sub-No.
2X)*

Dear Sir or Madam:

On or about December 22, 2014, Greenville County Economic Development Corporation (“GCEDC”), expects to file with the Surface Transportation Board (“Board”) a notice of exemption pursuant to 49 C.F.R. Part 1152, Subpart F – Exempt Abandonments, permitting GCEDC to abandon approximately 3.29 miles of rail line between milepost AJK 585.34 in East Greenville, SC, and milepost AJK 588.63 in Greenville, SC. The entire line is located in Greenville County, SC. The Line traverses United States Postal Zip Code territory 29607. There are no customers served on the subject line segment, and the line has been out of service for over ten years.

Attached is a combined Environmental and Historic Report (the “E&HR”), which includes a map of the affected area, and describes the proposed action and any expected environmental and historic effects. If you wish to address any of the information contained in the attached E&HR, or if you have any questions about the Board’s environmental review process, please contact the Board’s Office of Environmental Analysis (“OEA”), Surface Transportation Board, 395 E Street, SW, Washington, DC 20423-0001; TEL: (202) 245-0295, and refer to STB Docket No. AB-490 (Sub-No. 2X). You may also contact the undersigned counsel for GCEDC.

Questions regarding the abandonment process generally, offers of financial assistance, and/or public use or trails use may be directed to the Board’s Office of Public Assistance, Governmental Affairs, and Compliance at 202-245-0230. Based on information in our

Public Service Commission of South Carolina

December 9, 2014

Page 2

possession, the Line does not contain federally granted rights-of-way. Any documentation in GCEDC's possession will be made available promptly to those requesting it.

If there are any questions concerning this notice of intent to abandon, please contact me, GCEDC's representative, by mail at: William A. Mullins, Baker & Miller, PLLC, 2401 Pennsylvania Avenue, NW, Suite 300, Washington, DC 20037; by FAX: (202) 663-7849; by e-mail: wmullins@bakerandmiller.com; or by telephone: (202) 663-7820.

Sincerely,

A handwritten signature in black ink, appearing to read 'William A. Mullins', with a long horizontal flourish extending to the right.

William A. Mullins
Counsel for Greenville County Economic
Development Corporation

Enclosure

**BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, DC**

**STB DOCKET NO. AB-490
(SUB-NO. 2X)**

**GREENVILLE COUNTY ECONOMIC DEVELOPMENT CORPORATION
- ABANDONMENT EXEMPTION - IN GREENVILLE COUNTY, SC**

COMBINED ENVIRONMENTAL AND HISTORIC REPORT

Greenville County Economic Development Corporation ("GCEDC") submits this Combined Environmental and Historic Report ("E&HR") pursuant to 49 C.F.R. § 1105.7(e) and 49 C.F.R. § 1105.8(d), respectively, in connection with the proposed abandonment of 3.29 miles of rail line between milepost AJK 585.34 in East Greenville, SC, and milepost AJK 588.63 in Greenville, SC.

ENVIRONMENTAL REPORT

49 CFR §1105.7(e)(1):

(1) PROPOSED ACTION AND ALTERNATIVES

Describe the proposed action, including commodities transported, the planned disposition (if any) of any rail line and other structures that may be involved, and any possible changes in current operations or maintenance practices. Also describe any reasonable alternatives to the proposed action. Include a readable, detailed map and drawings clearly delineating the project.

Response

Greenville County Economic Development Corporation ("GCEDC") seeks to abandon 3.29 miles of rail Line, between milepost AJK 585.34 in East Greenville, SC, and milepost AJK 588.63 (the "Line") in Greenville County, SC.

This Line segment was previously the subject of a 2005 abandonment and discontinuance proceeding. In that proceeding, GCEDC filed for and was granted discontinuance authority for the 3.29-mile Line segment currently proposed for abandonment.¹

¹ See Greenville County Economic Development Corporation – Abandonment and Discontinuance Exemption – In Greenville County, SC, STB Docket No. AB-490 (STB served October 12, 2005).

Environmental and Historic Report Certificate of Service

Pursuant to the requirements of 49 C.F.R. § 1105.7(b) and 49 C.F.R. § 1105.8(c), the undersigned hereby certifies that a copy of the Combined Environmental and Historic Report in Docket No. AB-490 (Sub-No. 2X) was mailed via first class mail on November 13, 2014 to the following parties:

State Clearinghouse
1201 Main Street, Suite 950
Columbia, SC 29201

S.C. Department of Health & Environmental
Control
2600 Bull Street
Columbia, SC 29201

South Carolina Department of Natural
Resources
Rembert C. Dennis Building,
1000 Assembly Street
Columbia, SC 29201

South Carolina Ocean and Coastal
Resources Management
1362 McMillan Avenue Suite 400
Charleston, SC 29405

Upstate EQC Greenville
200 University Ridge
Greenville, SC 29601

Joseph Kernell, County Administrator
301 University Ridge
Suite 2400
Greenville County Square
Greenville, SC 29601

Greenville County Council
301 University Ridge
Suite 2400
Greenville SC 29601

U.S. Army Corps of Engineers
69A Hagood Avenue
Charleston, SC 29403

Knox White, Mayor
P.O. Box 2207
Greenville, SC 29602-2207
Mayor@greatergreenville.com

United States Environmental Protection
Agency - Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Cindy Dohner, Regional Director
U.S. Fish & Wildlife Service
1875 Century Boulevard, Suite 380
Atlanta, GA 30345

NPS Southeast Regional Office
Atlanta Federal Center
1924 Building
100 Alabama Street, SW
Atlanta, Georgia 30303

USDA-NRCS South Carolina State Office
Strom Thurmond Federal Building
1835 Assembly Street, Room 950
Columbia, SC 29201

NOAA, National Geodetic Survey
1315 East-West Highway
Silver Spring, MD 20910-3282

W. Eric Emerson, Ph.D., Director
South Carolina State Historic Preservation
Office
South Carolina Preservation Officer
8301 Parklane Road
Columbia, SC 29223-4905


William A. Mullins
November 13, 2014

No rail traffic has moved over the Line in more than ten years. GCEDC last used the Line for storage of rail cars in 2005. The alternative to abandonment is to not abandon the Line. This alternative is not satisfactory. Service over the Line is not required to serve any shippers. GCEDC would incur opportunity and other holding costs in connection with the retention of otherwise sellable real estate that would need to be covered by non-existent shippers were the Line segment to be retained. Despite service over the Line being available, since 2005, no shipper has made use of that service. Thus, GCEDC believes abandonment is the only feasible alternative.

If the requested authority is granted, GCEDC will salvage rail and track materials from the Line. GCEDC anticipates entering into an agreement with a willing trail user to preserve the rail corridor for possible future reactivation as a rail freight and commuter or high speed passenger Line. A map depicting the Line proposed for abandonment is attached as Exhibit 1.

(2) TRANSPORTATION SYSTEM

Describe the effects of the proposed action on regional or local transportation systems and patterns. Estimate the amount of traffic (passenger or freight) that will be diverted to other transportation systems or modes as a result of the proposed action.

Response

The abandonment should have no effect on regional or local transportation systems and patterns, because the Line proposed for abandonment has been out of service for more than ten years. Accordingly, no diversion of traffic from rail to other modes is expected.

(3) LAND USE

- (i) Based on consultation with local and/or regional planning agencies and/or a review of the official planning documents prepared by such agencies, state whether the proposed action is consistent with existing land use plans. Describe any inconsistencies.**

Response

GCEDC is a public benefit non-profit corporation organized and existing under the laws of the State of South Carolina. GCEDC was created by the County of Greenville, South Carolina for the purpose of owning, leasing, constructing, acquiring and operating buildings, equipment, public utilities, and transportation services and facilities functionally related to the promotion of the economic development of Greenville County thus granting GCEDC the authority to acquire and preserve railroad rights-of-way and, if feasible, provide for operation. In 2005, GCEDC only applied for discontinuance authority over the Line segment, to allow for continued rail operations. However, no shippers have come forth in need of rail service. Accordingly, GCEDC is now seeking abandonment authority to allow GCEDC to enter into a trail use arrangement, which will allow for preservation of the rail corridor for possible future reactivation as a rail freight and commuter or high speed passenger Line, consistent with local land use plans. An example of the transmittal letter

sent to various consulting agencies is attached as Exhibit 2. A copy of this E&HR has been mailed to the appropriate local and state agencies for their information and further comment.

- (ii) **Based on consultation with the U.S. Soil Conservation Service, state the effect of the proposed action on any prime agricultural land.**

Response

GCEDC does not believe that the proposed abandonment will have any adverse impact on prime agricultural land. Some of the adjacent land may be used for agricultural purposes, but GCEDC does not anticipate that the proposed abandonment would have any adverse impact on prime agricultural lands. GCEDC has notified the United States Department of Agriculture ("USDA") Natural Resources Conservation Service in Columbia, SC, by letter dated November 13, 2014 and has requested assistance in identifying any potential effects on prime agricultural land. An example of the transmittal letter sent to various consulting agencies is attached as Exhibit 2. A copy of this E&HR has been supplied to USDA for its information and comment.

- (iii) **If the action affects land or water uses within a designated coastal zone, include the coastal zone information required by §1105.9.**

Response

GCEDC does not believe that the Line traverses a designated coastal zone, and, thus, GCEDC understands that its proposed abandonment would not be subject to review in any applicable coastal zone management plan. GCEDC has notified the South Carolina Ocean and Coastal Resources Management ("SCOCR"), by letter dated November 13, 2014 to confirm that conclusion. An example of the transmittal letter sent to various consulting agencies is attached as Exhibit 2. A copy of this E&HR has been supplied to SCOCR for its information and comment.

- (iv) **If the proposed action is an abandonment state whether or not the right-of-way is suitable for alternative public use under 49 U.S.C. 10906 and explain why.**

Response

GCEDC believes that the right-of-way is appropriate for interim public use as a trail, and potentially in the future for commuter or high speed rail operations.

(4) **ENERGY**

- (i) **Describe the effect of the proposed action on transportation of energy resources.**

Response

Traffic has not moved over the segment during GCEDC's ownership. GCEDC is not aware of energy resources (*e.g.*, coal or petroleum products) having been transported on either segment prior to GCEDC's purchase of the property. Accordingly, GCEDC does not

believe that transportation of energy resources will be affected.

(ii) Describe the effect of the proposed action on recyclable commodities.

Response

Because no shipper will lose rail service, the proposed abandonment should have no effect on the movement and/or recovery of recyclable commodities.

(iii) State whether the proposed action will result in an increase or decrease in overall energy efficiency and explain why.

Response

The proposed actions will result in little or no change in overall energy efficiency. Traffic has not moved on the segment for over ten years. Accordingly, abandonment will not change the status quo in terms of current efficiency of the use of energy resources.

(iv) If the proposed action will cause diversions from rail to motor carriage of more than:

(A) 1,000 rail carloads a year; or

(B) An average of 50 rail carloads per mile per year for any part of the affected line, quantify the resulting net change in energy consumption and show the data and methodology used to arrive at the figure given.

Response

No diversion of traffic to motor carriers will occur (or exceed the thresholds set forth at 49 CFR §1105.7(e)(4)), because no traffic has moved over the Line in more than ten years. Accordingly, there is no need to produce data on diverted traffic or to quantify the net change in energy consumption.

(5) AIR

(i) If the proposed action will result in either:

(A) An increase in rail traffic of at least 100 percent (measured in gross ton miles annually) or an increase of at least eight trains a day on any segment of rail line affected by the proposal, or

(B) An increase in rail yard activity of at least 100 percent (measured by carload activity), or

(C) An average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on any affected road segment, quantify the anticipated effect on air emissions. For a proposal under 49

U.S.C. 10901 (or 10505) to construct a new line or reinstitute service over a previously abandoned line, only the eight train a day provision in subsection (5)(i)(A) will apply.

Response

The above thresholds will not be exceeded.

- (ii) If the proposed action affects a class I or nonattainment area under the Clean Air Act, and will result in either:**
- (A) An increase in rail traffic of at least 50 percent (measured in gross ton miles annually) or an increase of at least three trains a day on any segment of rail line,**
 - (B) An increase in rail yard activity of at least 20 percent (measured by carload activity), or**
 - (C) An average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on a given road segment, then state whether any expected increased emissions are within the parameters established by the State Implementation Plan. However, for a rail construction under 49 U.S.C. 10901 (or 49 U.S.C. 10505), or a case involving the reinstitution of service over a previously abandoned line, only the three train a day threshold in this item shall apply.**

Response

Greenville County is in attainment with the Clean Air Act for ground level ozone.

- (iii) If transportation of ozone depleting materials (such as nitrogen oxide and freon) is contemplated, identify: the materials and quantity; the frequency of service; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and spills; contingency plans to deal with accidental spills; and the likelihood of an accidental release of ozone depleting materials in the event of a collision or derailment.**

Response

The transportation of ozone depleting materials is not contemplated.

(6) NOISE

If any of the thresholds identified in item (5)(i) of this section are surpassed, state whether the proposed action will cause:

- (i) An incremental increase in noise levels of three decibels Ldn or more; or**
- (ii) An increase to a noise level of 65 decibels Ldn or greater. If so, identify sensitive receptors (e.g., schools, libraries, hospitals, residences, retirement communities, and nursing homes) in the project area, and quantify the noise increase for these receptors if the thresholds are surpassed.**

Response

The above thresholds will not be exceeded.

(7) SAFETY

(i) Describe any effects of the proposed action on public health and safety (including vehicle delay time at railroad grade crossings).

Response

The proposed action would improve public safety by allowing the four existing grade crossings on the Line segment² to be permanently repaired for motor vehicle traffic. There will be no change in current vehicle delay time at railroad grade crossings inasmuch as no rail traffic has moved on either segment in over ten years.

(ii) If hazardous materials are expected to be transported, identify: the materials and quantity; the frequency of service; whether chemicals are being transported that, if mixed, could react to form more hazardous compounds; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and hazardous spills; the contingency plans to deal with accidental spills; and the likelihood of an accidental release of hazardous materials.

Response

Hazardous materials are not currently transported on the Line.

² Grade crossings are located at Airport Road, Haywood Road, Verdae Blvd, and Millennium Blvd.

(iii) If there are any known hazardous waste sites or sites where there have been known hazardous materials spills on the right-of-way, identify the location of those sites and the types of hazardous materials involved.

Response

There are no known hazardous waste sites or known sites of hazardous materials spills along the Line.

(8) BIOLOGICAL RESOURCES

(i) Based on consultation with the U.S. Fish and Wildlife Service, state whether the proposed action is likely to adversely affect endangered or threatened species or areas designated as a critical habitat, and if so, describe the effects.

Response

GCEDC does not believe this abandonment will have an adverse impact on endangered or threatened species or areas designated as a critical habitat. However, GCEDC has notified the U.S. Fish and Wildlife Services (“USFWS”) and the South Carolina Department of Health & Environmental Control (“SCDHEC”) by letter dated November 13, 2014 to request assistance in determining whether the proposed abandonment would adversely affect endangered or threatened species or areas designated as a critical habitat. An example of the transmittal letter sent to various consulting agencies is attached as Exhibit 2. A copy of this E&HR has been supplied to the USFWS and SCDHEC for their information and comment.

(ii) State whether wildlife sanctuaries or refuges, National or State parks or forests will be affected, and describe any effects.

Response

The Line segment proposed for abandonment does not appear to pass through state parks or forests, national parks or forests, or wildlife sanctuaries. Thus, no adverse effects on wildlife sanctuaries, national parks or forests, or state parks or forests are anticipated.

(9) WATER

(i) Based on consultation with State water quality officials, state whether the proposed action is consistent with applicable Federal, State or local water quality standards. Describe any inconsistencies.

Response

GCEDC expects that the proposed abandonment will be consistent with applicable water quality standards. However, GCEDC has contacted the SCDHEC and Upstate EQC Greenville by letters dated November 13, 2014 to evaluate any potential impact on water quality. An example of the transmittal letter sent to various consulting agencies is attached

as Exhibit 2. A copy of this E&HR was supplied to SCDHEC and Upstate EQC Greenville for their information and comment.

(ii) Based on consultation with the U.S. Army Corps of Engineers, state whether permits under section 404 of the Clean Water Act (33 U.S.C. 1344) are required for the proposed action and whether any designated wetlands or 100-year flood plains will be affected. Describe the effects.

Response

GCEDC believes that no permits under section 404 of the Clean Water Act will be required because while the tracks will be removed from the Laurel Creek trestle, the Laurel Creek trestle will not be removed (salvaged). Thus, no salvage activities are anticipated to occur in any waterways, and the 100-year flood plains should not be adversely impacted by the proposed abandonment. However, GCEDC has contacted the Charleston office of the U.S. Army Corps of Engineers (“USACE”) by letter dated November 13, 2014 to solicit input on any impact. An example of the transmittal letter sent to various consulting agencies is attached as Exhibit 2. A copy of this E&HR was supplied to USACE for its information and comment.

(iii) State whether permits under section 402 of the Clean Water Act (33 U.S.C. 1342) are required for the proposed action.

Response

GCEDC does not plan to remove or alter the roadbed underlying the Line to be abandoned, to undertake in-stream work or to dredge or use any fill materials. There will be no excavation or other ground-disturbance activity, and, because no soils will be disturbed, no storm water mitigation or National Pollutant Discharge Elimination System permit will be required. GCEDC anticipates that the abandonment will not affect water quality and that permitting under Section 402 will not be required. However, as indicated above GCEDC has contacted the S.C. Department of Health & Environmental Control and Upstate EQC Greenville by letters dated November 13, 2014 to evaluate any potential impact. An example of the transmittal letter sent to various consulting agencies is attached as Exhibit 2. A copy of this E&HR was supplied to both agencies for their information and comment.

(10) PROPOSED MITIGATION

Describe any actions that are proposed to mitigate adverse environmental impacts, indicating why the proposed mitigation is appropriate.

Response

GCEDC anticipates no adverse environmental impacts in the project area as a result of this abandonment; therefore, mitigating action should not be necessary.

(11) **ADDITIONAL INFORMATION FOR RAIL CONSTRUCTIONS**

Response

Not applicable.

HISTORIC REPORT

49 CFR §1105.8 (d)(1):

- (1) **A U.S.G.S. topographic map (or an alternate map drawn to scale and sufficiently detailed to show buildings and other structures in the vicinity of the proposed action) showing the location of the proposed action, and the locations and approximate dimensions of railroad structures that are 50 years old or older and are part of the proposed action;**

Response

There are two known railroad structures, a railroad bridge and a trestle, on the Line. The railroad bridge, which is located at Milepost AKJ 587.07 (Woodruff Road), was completely rebuilt in 2008, in connection with a highway widening project; the bridge's dimensions are depicted on the map attached as Exhibit 1. There is one trestle on the Line, located at milepost AKJ 587.34, which crosses over Laurel Creek and may be 50 years old or older. Exhibit 1 (Location Map) shows the bridge crossing of Woodruff Road and Exhibit 3 (U.S.G.S. Topographic map) shows the location of the trestle (over Laurel Creek) on the Southern Segment. Both maps have been supplied to the South Carolina State Historic Preservation Office.

- (2) **A written description of the right-of-way (including approximate widths, to the extent known), and the topography and urban and/or rural characteristics of the surrounding area;**

Response

The right-of-way varies in width from 15 to 200 feet. The Line, which is located in an urban area, has a slight decline in elevation extending from the southeast point of the Line to the end of the Line segment.

- (3) **Good quality photographs (actual photographic prints, not photocopies) of railroad structures on the property that are 50 years old or older and of the immediately surrounding area;**

Response

There is a trestle on the Line that may be 50 years old or older, which crosses over Laurel Creek. Photographs of the trestle are included in Exhibit 3.

- (4) **The date(s) of construction of the structure(s), and the date(s) and extent of any major alterations, to the extent such information is known;**

Response

The exact date of construction for the Laurel Creek trestle is unknown. An STB decision from 1998 indicates the Line was constructed between 1910 and 1925. GCEDC has not made any major alterations to the trestle, since taking over ownership of the Line in 1999.³

- (5) **A brief narrative history of carrier operations in the area, and an explanation of what, if any, changes are contemplated as a result of the proposed action;**

Response

According to information available to GCEDC, the Carolina, Knoxville & Western Railway was built from Greenville, SC to Marietta, SC in 1888, and subsequently was extended to River Falls, SC, but the operation was abandoned in 1899. The Greenville & Knoxville Railroad was formed to revive the Line in 1907 and ran it until 1914. The company was reorganized as the Greenville & Western, and was then renamed the Greenville & Northern in 1920. The Line was cut back to Travelers Rest in the mid-1950s, but the section between Traveler's Rest and Cleveland was not officially abandoned until 1970. The Carolina Piedmont Division of the South Carolina Central Railroad bought the Greenville & Northern Line from Pinsly Railroad in April 1997, and the last train ran on the Northern Segment in February 1998. Railtex (the owner of Carolina Piedmont Division of the South Carolina Railroad) sold the Line, which included a northern and southern segment, to GCEDC in June 1999. GCEDC abandoned the Northern segment of the Line, which extended from Greenville to Traveler's Rest, in 2005.⁴

The current corridor that GCEDC is filing for abandonment is 3.29 miles and it used to be referred to as the "Southern Segment." This segment runs southeast from Highway 291 to the Clemson University International Center for Automotive Research (CU-ICAR) in the City of Greenville, SC.

- (6) **A brief summary of documents in the carrier's possession, such as engineering drawings, that might be useful in documenting a structure that is found to be historic;**

Response

GCEDC does not have any documents in its possession that might be useful in documenting whether or not any structures are historic.

³ South Carolina Central Railroad Company, Inc., D/B/A Carolina Piedmont Division – Abandonment Exemption – In Greenville County, SC (STB served Mar. 30, 1998)

⁴ Supra, FN. 1.

- (7) **An opinion (based on readily available information in the railroad's possession) as to whether the site and/or structures meet the criteria for listing on the National Register of Historic Places (36 CFR 60.4), and whether there is a likelihood of archeological resources or any other previously unknown historic properties in the project area, and the basis for these opinions (including any consultations with the State Historic Preservation Office, local historical societies or universities);**

None of the information readily available to GCEDC leads GCEDC to believe that the trestle on the Line is significant in American history, architecture, archeology, engineering, or culture; are associated with events that have made a significant contribution to the broad patterns of U.S. history; are associated with the lives of persons significant in our past; embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; or have yielded, or may be likely to yield, information important in prehistory or history.

- (8) **A description (based on readily available information in the railroad's possession) of any known prior subsurface ground disturbance or fill, environmental conditions (naturally occurring or manmade) that might affect the archeological recovery of resources (such as swampy conditions or the presence of toxic wastes), and the surrounding terrain.**

GCEDC has no such information readily available, beyond that shown on the topographic maps in Exhibit 2.

9) Follow-Up Information

Additional information will be provided as appropriate.

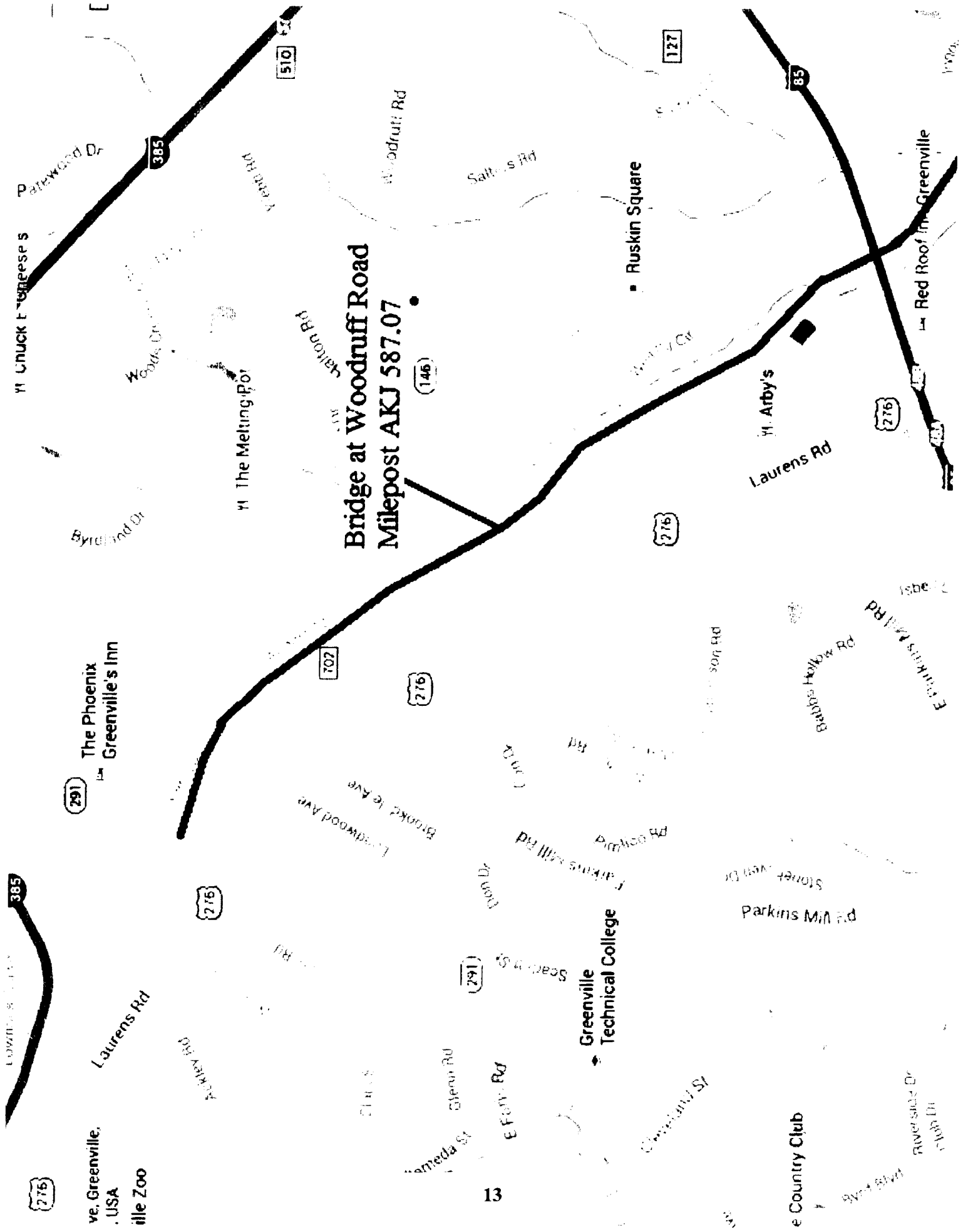
**BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, DC**

**STB DOCKET NO. AB-490
(SUB-NO. 2X)**

**GREENVILLE COUNTY ECONOMIC DEVELOPMENT CORPORATION
- ABANDONMENT EXEMPTION - IN GREENVILLE COUNTY, SC**

ENVIRONMENTAL AND HISTORIC REPORT

EXHIBIT 1 – LOCATION MAP



**BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, DC**

**STB DOCKET NO. AB-490
(SUB-NO. 2X)**

**GREENVILLE COUNTY ECONOMIC DEVELOPMENT CORPORATION
- ABANDONMENT EXEMPTION - IN GREENVILLE COUNTY, SC**

ENVIRONMENTAL AND HISTORIC REPORT

EXHIBIT 2 – SAMPLE CONSULTATION LETTER

BAKER & MILLER PLLC

ATTORNEYS and COUNSELLORS

2401 PENNSYLVANIA AVENUE, NW
SUITE 300
WASHINGTON, DC 20037

TELEPHONE: (202) 663-7820
FACSIMILE: (202) 663-7849

William A. Mullins

Direct Dial: (202) 663-7823
E-Mail: wmullins@bakerandmiller.com

November 13, 2014

State Clearinghouse
1201 Main Street, Suite 950
Columbia, SC 29201

Re: STB Docket No. AB-490 (Sub-No. 2X)
Greenville County Economic Development Corporation – Abandonment
Exemption - In Greenville County, SC

Dear Sir or Madam,

On or after December 5, 2014, Greenville County Economic Development Corporation (“GCEDC”) expects to file with the Surface Transportation Board, a notice of exemption seeking authority for GCEDC to abandon approximately 3.29 miles of rail line between milepost AJK 585.34 in East Greenville, SC, and milepost AJK 588.63 in Greenville, SC. The entire line is located in Greenville County, SC. Attached is an Environmental and Historic Report (“E&HR”), which describes the proposed action and any anticipated environmental and historic effects, and includes maps of the affected area.

We are providing this E&HR so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information in the E&HR appears to be misleading or incorrect, pertinent information appears to be missing, or you have any questions about the Board's environmental review process, please contact the Section of Environmental Analysis (SEA), Surface Transportation Board, 395 E Street, SW, Washington, D.C. 20423, or by calling that office at (202) 245-0295 and refer to Docket No. AB-490 (Sub-No. 2X). Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to SEA (with a copy to me) would be appreciated within 3 weeks.

Your comments will be considered by the Board in evaluating the environmental and/or historic preservation impacts of the contemplated action. If there are any questions concerning

BAKER & MILLER PLLC

State Clearinghouse

November 13, 2014

Page 2

this E&HR, please contact me directly. I am GCEDC's representative in this matter. I can be contacted by telephone at (202) 663-7823, and by mail and by e-mail at the addresses shown above.

Sincerely,

A handwritten signature in black ink, appearing to read "William A. Mullins", with a stylized flourish at the end.

William A. Mullins

Enclosure

cc: Mark Tollison

**BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, DC**

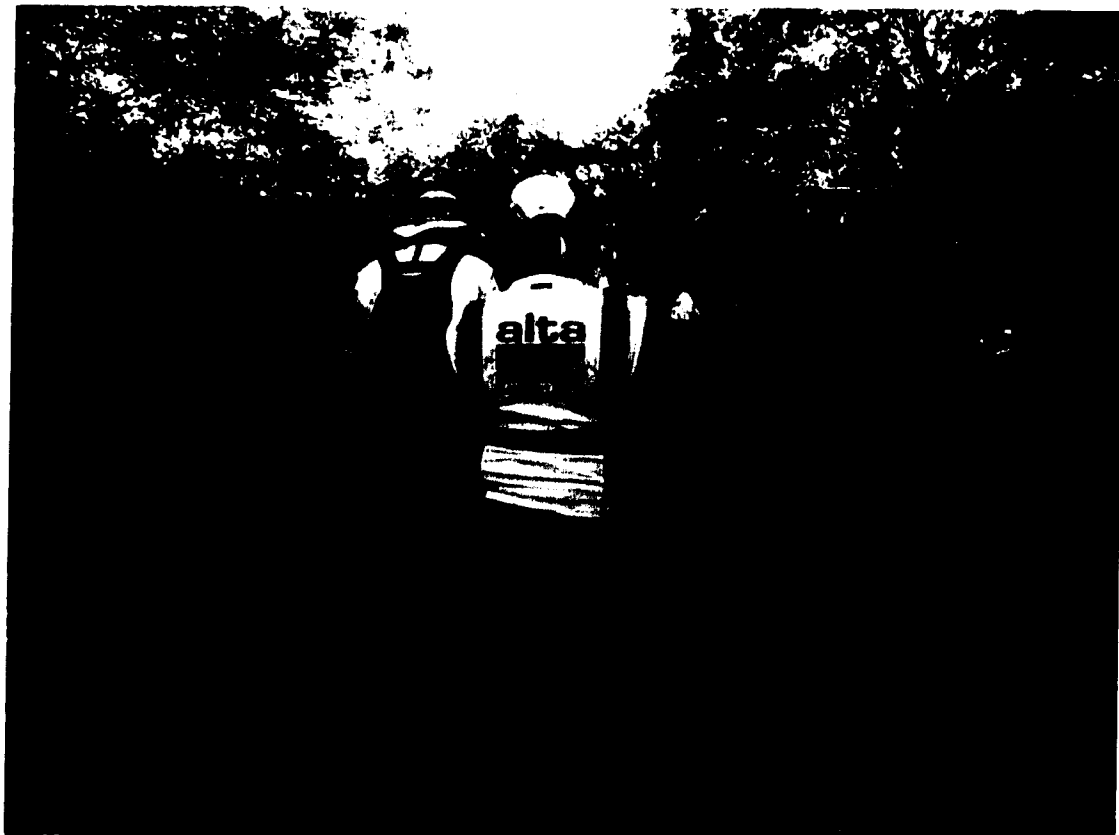
**STB DOCKET NO. AB-490
(SUB-NO. 2X)**

**GREENVILLE COUNTY ECONOMIC DEVELOPMENT CORPORATION
- ABANDONMENT EXEMPTION - IN GREENVILLE COUNTY, SC**

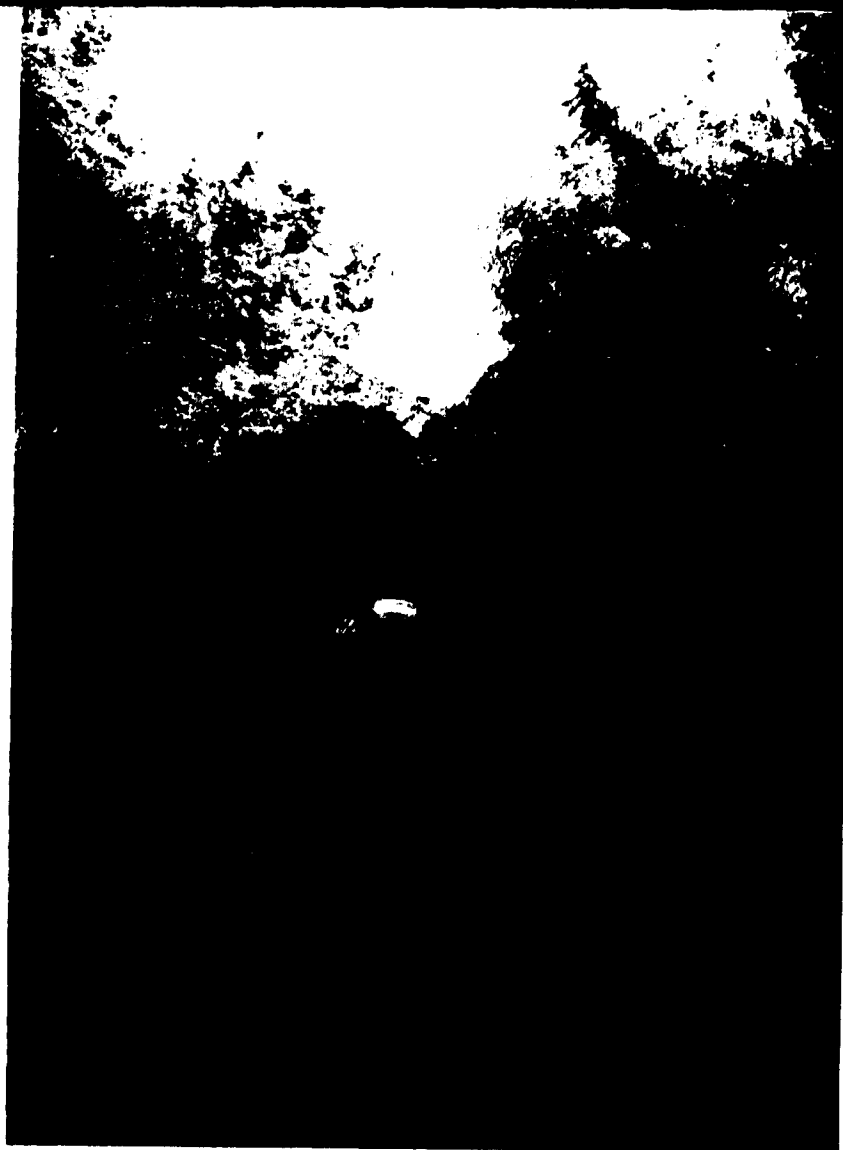
ENVIRONMENTAL AND HISTORIC REPORT

**EXHIBIT 3 – U.S.G.S. TOPOGRAPHIC MAP & PHOTOS OF LAUREL CREEK
TRESTLE**

Laurel Creek Trestle
MP AKJ 587.34



Laurel Creek Trestle
MP AKJ 587.34



Laurel Creek Trestle
MP AKJ 587.34

